U.S. DISTRICT COURT

DISTRICT OF VERMONT

FILED

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# FOR THE DISTRICT OF VERMONT

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UNITED STATES OF AMERICA	DEPUTY CLERK
v.	) Criminal No.
	)
BRIAN FOLKS, aka "Moe," aka "Moet Hart,"	5:16-cr-94
DONALD MCFARLAN, aka "G" and	)
MANDY LATULIPPE,	)
Defendants.	)

### **INDICTMENT**

#### Count 1

The Grand Jury charges that:

From in or about May of 2015, until on or about March of 2016, in the District of Vermont and elsewhere, the defendants, BRIAN FOLKS, aka "Moe," aka "Moet Hart," DONALD MCFARLAN, aka "G," MANDY LATULIPPE, and others, known and unknown to the Grand Jury, knowingly and willfully conspired to distribute heroin, a Schedule I controlled substance, and cocaine and cocaine base, Schedule II controlled substances.

With respect to defendants BRIAN FOLKS, aka "Moe," aka "Moet Hart," and DONALD MCFARLAN, aka "G," their conduct as a members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base and 100 grams or more of a mixture and substance containing a detectable amount of heroin.

(21 U.S.C. §§ 841(a), 841(b)(1)(B), 846)

The Grand Jury further charges that:

On or about January 6, 2016, in the District of Vermont, the defendants, BRIAN FOLKS, aka "Moe," aka "Moet Hart" and MANDY LATULIPPE, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. §2)

The Grand Jury further charges that:

On or about January 12, 2016, in the District of Vermont, the defendant, DONALD MCFARLAN, aka "G," knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C))

The Grand Jury further charges that:

On or about January 12, 2016, in the District of Vermont, the defendants, BRIAN FOLKS, aka "Moe," aka "Moet Hart" and MANDY LATULIPPE, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. §2)

The Grand Jury further charges that:

On or about January 13, 2016, in the District of Vermont, the defendant, DONALD MCFARLAN, aka "G," knowingly and intentionally possessed with intent to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance. The offense involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base and 100 grams or more of a mixture and substance containing a detectable amount of heroin.

(21 U.S.C. §§ 841(a), 841(b)(1)(B))

The Grand Jury further charges that:

On or about January 22, 2016, in the District of Vermont, the defendants, BRIAN FOLKS, aka "Moe," aka "Moet Hart" and MANDY LATULIPPE, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. §2)

The Grand Jury further charges that:

On or about February 10, 2016, in the District of Vermont, the defendants, BRIAN FOLKS, aka "Moe," aka "Moet Hart" and MANDY LATULIPPE, knowingly and intentionally distributed heroin, a Schedule I controlled substance.

(21 U.S.C. §§ 841(a), 841(b)(1)(C); 18 U.S.C. §2)



(TCD) Eric Miller

United States Attorney Burlington, Vermont

July 14, 2016